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Department of Energy

Richland Operations Office

P.O. Box 550

Richland, Washington 99352

JUL 21 1995

0041692

95-PCA-397

Mr. Michael A. Wilson, Manager
Nuclear Waste Program
State of Washington
Department of Ecology
P.O. Box 47600
Olympia, Washington 98504

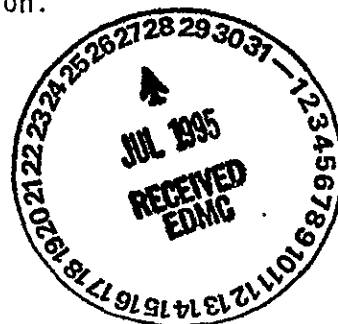
Dear Mr. Wilson:

HANFORD SITE COMMENTS ON THE MODIFICATION PACKAGE ISSUED FOR PUBLIC COMMENT ON JUNE 8, 1995, FOR THE HANFORD FACILITY RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT, DANGEROUS WASTE PORTION

The U.S. Department of Energy, Richland Operations Office (RL), Westinghouse Hanford Company (WHC), Bechtel Hanford, Inc. (BHI), and Pacific Northwest Laboratory (PNL) jointly are submitting the "Hanford Site Comments on the Modification Package Issued for Public Comment on June 8, 1995, for the Hanford Facility RCRA Permit, Dangerous Waste Portion" (hereinafter termed the Comment Document). This Comment Document was prepared in response to a State of Washington, Department of Ecology (Ecology), request for comments initiating on June 8, 1995, and ending on July 24, 1995.

The proposed modification will incorporate three Closure Plans (105-DR Large Sodium Fire Facility, 304 Concretion Facility, and the Hanford Patrol Academy Demolition Sites) into the Hanford Facility RCRA Permit and add a Permit Modification Schedule through the year 2000. Adoption of the proposed modification generally is supported; however, there are a few specific areas that merit further consideration by Ecology. The Comment Document addresses those areas that could be enhanced by additional clarification or explanation. It is also noted that discussions are needed to identify the appropriate process for administrating the RCRA corrective action units that are not included in the Permit Modification Schedule. In addition, ongoing compliance with the modification schedule as incorporated could be impacted by subsequent approved budget and funding levels.

Incorporation of these comments into the modification, as finally adopted, will enhance efforts to meet our collective objective of ensuring the most expeditious, efficient, and comprehensive reclamation of the Hanford Facility. We request incorporation of these comments in the spirit of continuing open communication with, and responsiveness to, your organization.



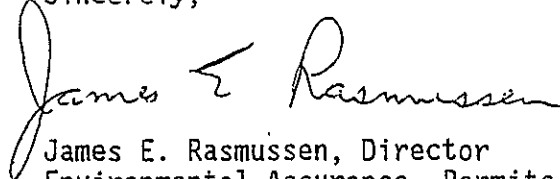
Mr. Michael A. Wilson
95-PCA-397

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If you have any questions regarding the contents of this letter or the enclosure, please contact Mr. C. E. Clark of RL on (509) 376-9333, Ms. S. M. Price of WHC on (509) 376-1653, Ms. L. A. Mihalik of BHI, or Mr. H. T. Tilden II of PNL on (509) 376-0499.

Sincerely,



James E. Rasmussen, Director
Environmental Assurance, Permits,
and Policy Division
DOE Richland Operations Office

EAP:HMR



William T. Dixon, Director
Environmental Services
Westinghouse Hanford Company



Thomas E. Logan
Manager of Projects
Bechtel Hanford, Inc.



for Kenneth C. Brog, Director
Environment, Safety, and Health
Pacific Northwest Laboratory

Enclosure

cc w/encl:
Administrative Record
EDMC, H6-08
C. Clarke, Ecology
D. Duncan, EPA
G. Emison, EPA
M. Gearheard, EPA
M. Jaraysi, Ecology
R. Jim, YIN
D. Powauke, NPT
S. Price, WHC
S. Sherwood, EPA
G. Smith, EPA
J. Witczak, Ecology
J. Wilkinson, CTUIR

cc w/o encl:
B. Austin, WHC
J. Badden, BHI
W. Dixon, WHC
D. Lundstrom, Ecology
L. Mihalik, BHI
J. Stohr, Ecology

HANFORD SITE COMMENTS ON THE MODIFICATION PACKAGE ISSUED FOR
PUBLIC COMMENT ON JUNE 8, 1995, FOR THE
HANFORD FACILITY RCRA PERMIT, DANGEROUS WASTE PORTION
(HANFORD SITE COMMENT DOCUMENT)

Conditions: V.9.B.a., V.10.B.a., and V.11.B.a.

Requested Action: Delete and replace with the following text:

Only if closure activities have not begun and will not be conducted in accordance with the Plan, including these Conditions to the Plan, a written notification shall be submitted to the Department within 30 days after the Plan is approved.

Justification: Closure activities have already begun.

Condition: V.9.B.g.

Requested Action: Delete.

Justification:

This condition, which applies to the Hanford Patrol Academy Demolition Site, refers to a risk analysis report prepared at the direction of the Ecology unit manager. However, the subject of the report was a napalm canister that (1) may or may not be within the boundaries of the unit, and (2) was related to non-Resource Conservation and Recovery Act (RCRA) activities. These situations are well documented in the closure plan. Because this risk analysis report does not relate to the closure of this unit, the condition is not applicable to this permit. In addition, the subject report was prepared after all sampling had been completed at the treatment unit, and no further disturbance of the site is anticipated due to RCRA activities.

Condition: V.10.B.d.

Requested Action: Change V.10.B.d. to V.10.B.f.

Justification: V.10.B.d. already exists.

Condition: V.10.B.d.

Requested Action: Change 180 days to 240 days

Justification:

Due to the complexity and the extent of sodium carbonate cleanup and removal from the 105-DR Large Sodium Fire Facility, an additional 60 days is needed to complete closure activities.

Condition: I.A.3., Permit Modification Schedule, Attachment 27, through the year 2000.

Requested Action: Move the 1325-N Liquid Waste Disposal and 1301-N Liquid Waste Disposal closure plan permit modifications from the 1998 Modification D to the 1999 Modification E.

Justification:

The proposed schedule misplaces the timing for two units: (1) 1325-N Liquid Waste Disposal and (2) 1301-N Liquid Waste Disposal.

Submittal of the Closure Plan/Corrective Measures Study (CP/CMS) for these units has been scheduled for March of 1997 in accordance with the Hanford Federal Facility Agreement and Consent Order (Milestone M-15-12B). Regulatory review, comment, incorporation, and approval of the CP/CMS would need to be completed in just 7 months in order to initiate advance agency review of Modification D in October 1997. This would be an extremely aggressive schedule considering that previous closure plan regulatory review/approval cycles have exceeded 30 months and planning for all other closure plans included in this schedule are based on at least a one year review/approval process. Therefore, it is requested that these units be placed into the Modification E draft schedule. A corrected schedule is attached.

Year and Mod.	TSD/Unit	*	Status and Remarks
1995 Mod. A	218-E-8 Borrow Pit Demolition Site	C	In Rev.1, Completed, approved.
	200 Area Ash Pit Demolition Site	C	In Rev.1, Completed, approved.
	216-B-3 Expansion Ponds	C	In Rev.1, Completed, approved.
	2101 M Pond	C	In Rev.1, Completed, approved.
	Simulated High Level Waste Slurry Treatment & Storage Sludge	C	In Rev.1, Completed, approved.
1995 Mod. A'	Hanford Patrol Academy Demolition Sites	C	Proposed for Rev.2
	105-DR Large Sodium Fire Facility	C	Proposed for Rev.2
	304 Concretion Facility	C	Proposed for Rev.2
1996 Mod. B	PUREX Tunnels 1 & 2	B	
	300 Area Process Trenches	C	
	3718-F Alkali Metal Storage	C	
	4843 Alkali Metal Storage	C	
1997 Mod. C	303-K Storage Facility	C	
	300 Waste Acid Treatment & Storage	C	
	325 Hazardous Waste Treatment Units Facility	B	
	200 Area Liquid Waste Complex	B	
	216-U-12 Crib	C	
	Low Level Burial Grounds	B	
1998 Mod. D	100 D Ponds	C	
	1325-N Liquid Waste Disposal	C	
	1301-N Liquid Waste Disposal	C	
	1324-N Surface Impoundment	C	
	1324-NA Percolation Pond	C	
	Hanford Central Waste Complex	B	
	Waste Receiving & Processing (1)	B	

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Year and Mod.	TSD/Unit	*	Status and Remarks
1999 Mod. E	222-S Laboratories	B	
	Double-Shell Tank System Farms	B	
	Transuranic Storage and Assay Facility (TRUSAF)	B	
	1325-N Liquid Waste Disposal	C	
	1301-N Liquid Waste Disposal	C	
2000 Mod. F	216-B-3 Main Pond	C	
	216-B-63 Trench	C	
	216-A-29 Ditch	C	

Legend: * Type of Permit
 B Part B Application
 C Closure/Postclosure Plan
 AC Administrative Closures

Note:

1. All TSD Units not shown in this table will be scheduled through a Class ¹1 Permit Modification (requiring prior approval) to Attachment 27.
2. All Permit Modifications listed in this table will be conducted in accordance with the applicable requirements in WAC 173-303-830.
3. New TSD Part B Applications, if submitted, will be added to this table through a Class ¹1 Permit Modification (requiring prior approval).